

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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SCOTT STERLING, Individually and on	:	Case No. 1:22-cv-7273-JMV-
Behalf of All Others Similarly Situated,	:	MAH
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
IRIS ENERGY LIMITED, DANIEL	:	
ROBERTS, WILLIAM ROBERTS, DAVID	:	STIPULATION AND
BARTHOLOMEW, CHRISTOPHER	:	[PROPOSED] ORDER FOR
GUZOWSKI, MICHAEL ALFRED,	:	UNDERWRITER
J.P. MORGAN SECURITIES LLC,	:	DEFENDANTS TO MOVE OR
CANACCORD GENUITY LLC,	:	OTHERWISE RESPOND TO
CITIGROUP GLOBAL MARKETS INC.,	:	FIRST AMENDED
CANTOR FITZGERALD & CO.,	:	COMPLAINT
GALAXY DIGITAL PARTNERS LLC,	:	
COMPASS POINT RESEARCH &	:	
TRADING, LLC, and MACQUARIE	:	
CAPITAL (USA) INC.,	:	
	:	
Defendants.	:	
-----	:	X

WHEREAS, on March 27, 2023, following the submission of motions for the appointment of Lead Plaintiff, the Court appointed (i) Network Racing Pty Ltd., Nahi Beaini, LRJ, Superannuation Fund, and De Stoop Investments Pty Ltd. as Lead Plaintiffs, (ii) Bottini & Bottini, Inc. as Lead Counsel for the putative class, and (iii) Cohn Lifland Pearlman Herrmann & Knopf LLP as Liaison Counsel (ECF No. 34);

WHEREAS, pursuant to the schedule set forth in a stipulation and Order dated April 20, 2023 (ECF No. 36), Lead Plaintiffs filed a First Amended Complaint on June 6, 2023 (ECF No. 38);

WHEREAS, the First Amended Complaint added as Defendants J.P. Morgan Securities LLC, Canaccord Genuity LLC, Citigroup Global Markets Inc., Cantor Fitzgerald & Co., Galaxy Digital Partners LLC, Compass Point Research & Trading, LLC, and Macquarie Capital (USA) Inc. (collectively, the “Underwriter Defendants”);

WHEREAS, Defendants Iris Energy Limited, Daniel Roberts, William Roberts, David Bartholomew, Christopher Guzowski, and Michael Alfred previously agreed to move or otherwise respond with respect to the First Amended Complaint by August 4, 2023 (ECF No. 36);

WHEREAS, the Parties have conferred and are in agreement on a schedule for the filing of the Underwriter Defendants’ response to the First Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the Parties, as follows:

1. The Underwriter Defendants' deadline to move to dismiss, answer, or otherwise respond to the First Amended Complaint is August 4, 2023.

2. If the Underwriter Defendants move to dismiss the First Amended Complaint, Lead Plaintiffs shall file their opposition thereto by October 4, 2023, and the Underwriter Defendants shall file any reply in further support of their motion to dismiss by November 17, 2023.

3. The Underwriter Defendants expressly reserve all rights, defenses, or other objections, except as to service of the summons and First Amended Complaint.

4. Nothing in this stipulation and Order shall prejudice the right of any Party to seek further extensions on the consent of the other Parties or from the Court.

Respectfully submitted this 4th day of August 2023, by:

Dated: August 4, 2023

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/s/ Scott D. Musoff

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Macquarie Capital (USA) Inc.*

Dated: August 4, 2023

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Attorneys for Lead Plaintiffs

IT IS SO ORDERED.

DATED: _____

HONORABLE JOHN MICHAEL VAZQUEZ
UNITED STATES DISTRICT JUDGE